

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

JANE DOE,)	
)	
Plaintiff,)	Civil Action No. 3: 2023-cv-00477
)	
v.)	
)	
WILLIAMS BOWERS MANAGEMENT,)	JUDGE CAMPBELL
LLC D/B/A WIDE OPEN MUSIC,)	MAGISTRATE JUDGE CHIP FRENSLEY
ASH BOWERS, JIMMIE ALLEN, and)	
JOHN DOES 1-100,)	
)	
)	
Defendants.)	

**AMENDED STIPULATION BETWEEN JANE DOE AND JIMMIE ALLEN
AND [PROPOSED] ORDER**

Plaintiff Jane Doe (“Plaintiff”) and Defendant Jimmie Allen (“Allen”) hereby stipulate to the dismissal of Plaintiff’s claims against Jimmie Allen (Counts I, III, IV, V, IX, X in the Verified Complaint [ECF 1]) with prejudice, and the dismissal of Allen’s Counterclaims against Plaintiff [ECF 27] with prejudice. The Court shall retain jurisdiction to enforce the Confidential Settlement Agreement and Release signed by both parties and effective March 14, 2024, together with the First Addendum to the Confidential Settlement Agreement and Release dated March 17, 2024.

Notwithstanding, Plaintiff will continue to pursue her claims against Defendants Williams Bowers Management, LLC d/b/a Wide Open Music and Ash Bowers. *See* Verified Complaint, Counts II, VI, VII, VIII, IX, X.

WHEREFORE, Plaintiff and Defendant Jimmie Allen respectfully request that the Court dismiss Plaintiff’s claims against Jimmie Allen (Counts I, III, IV, V, IX, X in the Verified Complaint [ECF 1]) with prejudice, dismiss Allen’s Counterclaims against Plaintiff [ECF 27] with prejudice, and retain jurisdiction to enforce the Confidential Settlement Agreement and Release dated March 14, 2024, and the First Addendum to the Confidential Settlement Agreement and Release dated March 17, 2024.

It is so **ORDERED**.

WILLIAM L CAMPBELL, JR.

UNITED STATES DISTRICT JUDGE

Submitted By:

Counsel for Plaintiff:

/s/ Elizabeth A. Fegan

Elizabeth A. Fegan (admitted *pro hac vice*)
FEGAN SCOTT LLC
150 S. Wacker Drive, 24th Floor
Chicago, IL 60606
(312) 264-0100
beth@feganscott.com

John T. Spragens (BPR # 31445)
SPRAGENS LAW PLC
311 22nd Ave. N.
Nashville, TN 37203
(615) 983-8900
john@spragenslaw.com

Counsel for Defendant Jimmie Allen:

/s/ Alandis K. Brassel

Alandis K. Brassel (BPR # 34159)
BRASSEL LAW PLLC
1033 Demonbreun Street, Suite 300
Nashville, TN 37203
(615) 258-8900
alandis@brassel.law

CERTIFICATE OF SERVICE

I, Elizabeth A. Fegan, an attorney, caused the foregoing to be filed on March 18, 2024 via the Court's electronic filing system which will serve all counsel of record, including:

Alandis K. Brassel (BPR # 34159)
BRASSEL LAW PLLC
1033 Demonbreun Street, Suite 300
Nashville, TN 37203
(615) 258-8900
alandis@brassel.law

Aubrey B. Harwell III (BPR # 17394)
William J. Harbison II (BPR # 33330)
Olivia R. Arboneaux (BPR # 40225)
NEAL & HARWELL, PLC
1201 Demonbreun Street, Suite 1000
Nashville, TN 37203
(615) 244-1713
tharwell@nealharwell.com
jharbison@nealharwell.com
oarboneaux@nealharwell.com

Dated: March 18, 2024

By: /s/ Elizabeth A. Fegan